

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MALEEHA AHMAD, et al.,                     )  
  )  
          Plaintiffs,                     ) Case No. 4:17-cv-2455-CDP  
  )  
v.   )  
  )  
CITY OF ST. LOUIS,                     )  
  )  
          Defendant.                     )

CONSENT MOTION FOR DISCOVERY PROTECTIVE ORDER

The parties jointly move for the entry of the protective order appended as Exhibit 1 hereto. In support of the motion, the parties state that discovery in this action entails disclosure of documents and other material (such as video interviews) that involve sensitive personnel disciplinary matters and law enforcement planning information that warrants protection from general distribution. The parties agree that it is appropriate to produce material in discovery that is designated as "attorneys/experts eyes only," subject to further review as needed. Accordingly, the parties have agreed to the appended protective order and respectfully request that the Court enter it.

Respectfully submitted,

/s/ Anthony E. Rothert

Anthony E. Rothert, #44827MO  
Jessie Steffan, #64861MO  
ACLU of Missouri Foundation  
906 Olive Street, Suite 1130  
St. Louis, Missouri 63101  
(314) 652-3114  
arothert@aclu-mo.org  
jsteffan@aclu-mo.org

Gillian R. Wilcox, #61278MO  
406 West 34th Street, Suite 420  
Kansas City, Missouri 64111  
ACLU of Missouri Foundation  
(816) 470-9938  
gwilcox@aclu-mo.org  
*Attorneys for Plaintiffs*

JULIAN L. BUSH  
CITY COUNSELOR

/s/ Robert H. Dierker  
Robert H. Dierker 23671MO  
Associate City Counselor  
dierkerr@stlouis-mo.gov  
Abby Duncan 67766MO  
Assistant City Counselor  
Megan Bruyns 69987MO  
Assistant City Counselor  
Amy Raimondo 71291MO  
Assistant City Counselor  
1200 Market St.  
City Hall, Rm 314  
St. Louis, MO 63103  
314-622-3361  
Fax 314-622-4956